TDS METROCOM EXHIBIT 2.0

BEFORE THE
ILLINOIS COMMERCE COMMISSION

DOCKET NO. 03-0596

REBUTTAL TESTIMONY OF

STEVEN J. PITTERLE

ON BEHALF OF

TDS METROCOM, LLC

February 4, 2004

Q. PLEASE STATE YOUR NAME, BUSINESS AFFILIATION AND ADDRESS

A. My name is Steven J. Pitterle. I am employed by TDS Metrocom, LLC as Manager – CLEC External Relations. My business address is 525 Junction Road, Madison, Wisconsin 53717.

Q. DID YOU PREVIOUSLY SUBMIT DIRECT TESTIMONY IN THIS PROCEEDING?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of my rebuttal testimony is to address portions of the Direct Testimony of ICC Staff witness Dr. Qin Liu as it relates to her comments on switched transport and OC-n transport and to reiterate in view of these comments that TDS Metrocom does not self-provision dedicated transport along the three routes between SBC wire centers in Illinois identified by SBC witness Smith in his testimony and therefore does not meet the criteria to be considered a Self Provisioning Trigger CLEC.[1]

Q. PLEASE SUMMARIZE WHY TDS METROCOM DOES NOT MEET THE SELF-PROVISIONING TRIGGER CRITERIA FOR DEDICATED TRANSPORT ON THE THREE ROUTES BETWEEN SBC COLLOCATION SITES IDENTIFIED BY SBC WITNESS SMITH?

A. As stated in my direct testimony, TDS Metrocom deploys its own fiber based transport facilities to various SBC wire center collocation sites. TDS Metrocom

[1] The three routes are identified in SBC witness Smith's Direct Testimony, Confidential Attachment JGS-10, page 3 of 3.

aggregates UNE-loops at these collocation sites, and connects the UNE- loops to TDS Metrocom's switch via its own transport facilities. TDS Metrocom does not, however, deploy transport facilities at a DS-3 or DS-1 capacity level on a dedicated basis between any of the specifically-identified TDS Metrocom collocation sites.

Q. IN LIGHT OF STAFF WITNESS DR. LIU'S TESTIMONY, COULD YOU FURTHER ELABORATE ON THE NETWORK ARRANGEMENTS TDS METROCOM HAS IN PLACE IN ILLINOIS?

A. Yes. TDS Metrocom deploys OC-n facilities (typically OC-12 or OC-48 capacity) on its fiber ring facilities in Illinois. For each route from an SBC wire center where TDS Metrocom is collocated to the TDS Metrocom switch, the electronics/terminal equipment associated with that specific route are located at the end points of the route. Thus, each facility route consists of what is called a "Home Run" transport arrangement between the SBC wire center and the TDS Metrocom switch. The transport facilities directly connect the aggregated UNE-loops, at each of the SBC end office collocation sites, to the TDS Metrocom switch and also provide for the exchange of traffic between those same two locations. There are however, no dedicated connections of OC-n transport facilities (or DS-3/DS-1 facilities) between any of the SBC collocation sites themselves, contrary to what was referenced by SBC witness Smith in his attachments or Dr. Liu's suggestion on Page 31 of her testimony. In short, **none** of the routes identified by SBC as TDS Metrocom routes satisfying the Self-

Provisioning Trigger test for DS-3 or DS-1 dedicated transport facilities actually meet the test as defined by the FCC.

Q. DR. LIU SUGGESTS AT SEVERAL POINTS IN HER TESTIMONY THAT EVEN IF A CLEC HAS ONLY FIBER FACILITIES FROM ITS SWITCH TO EACH OF TWO SBC COLLOCATION SITES, THAT THE CLEC STILL MAY SATISFY THE SELF PROVISIONING DEDICATED TRANSPORT TRIGGER CRITERIA SINCE ITS SWITCH COULD BE USED TO PROVIDE "SWITCHED TRANSPORT" BETWEEN TWO SBC COLLOCATION SITES. DO YOU AGREE WITH THIS ASSERTION?

A. No. First of all, the FCC was very clear in the TRO that there is a distinction between dedicated transport and shared or switched transport and devoted separate sections in its order to each type of transport. The rebuttal testimony of Mr. Gary Ball, who TDS Metrocom is co-sponsoring as a witness in this proceeding, addresses this issue in more detail as it relates to the applicable FCC TRO references that distinguish between these two types of transport.

The only means by which TDS Metrocom may currently connect any two SBC collocation sites together is through its switch. This switched connection is not dedicated or fixed between any two of the SBC collocation sites, since as soon as the switched call is discontinued, the path is opened between the two sites and another set of parties may use these facilities for an entirely different call. The FCC, in Paragraph 365 of its TRO, specifically identifies dedicated transport as "facilities dedicated to a particular customer or carrier". Facilities connecting two locations only for the duration of a call are not dedicated facilities. Rather, they are facilities available to any number of parties based on calling demands.

Q. DR. LIU ALSO INDICATES IN HER TESTIMONY THAT IF A CLEC HAS OC-n TRANSPORT FACILITIES ALONG A SPECIFIC ROUTE BETWEEN TWO SBC WIRE CENTERS, IT SHOULD NOT BE AUTOMATICALLY DISMISSED FROM QUALIFYING AS A SELF - PROVISIONING TRIGGER CLEC SINCE DS-1 and DS-3 FACILITIES ARE SUB - ELEMENTS OF THESE OC-n SYSTEMS AND CAN EASILY BE PROVISIONED. DO YOU AGREE WITH THIS ASSUMPTION?

A. No. TDS Metrocom has deployed OC-n facilities from each one of the SBC wire centers in Illinois where it is currently collocated, directly back to its own switch hub locations on a "Home Run" basis, but not between SBC wire center collocation sites. In order for TDS Metrocom to provision DS-1 or DS-3 capacity based transport facilities along its OC-n routes and have them connect two SBC collocation sites together on a dedicated transport basis, it would require multiplexing equipment and electronic cross connection capability at the TDS Metrocom switch site, which are not readily available or established today.

Since Paragraph 406 of the FCC's TRO under the Self Provisioning Trigger section (and the first sentence of footnote number1256) specify that the CLEC must be "operationally ready to provide transport into or out of an incumbent LEC central office", TDS Metrocom clearly does not meet the FCC TRO criteria for satisfying the Self–Provisioning Trigger – even if one accepted Dr. Liu's incorrect inclusion of switched transport as dedicated transport.

Q. IN SUMMARY, DO THE TYPE OF TRANSPORT ARRANGEMENTS THAT YOU HAVE DESCRIBED AS PROVISIONED BY TDS METROCOM CURRENTLY SATISFY EITHER OF THE TRANSPORT TRIGGERS IN THE FCC'S TRO?

A. No, TDS Metrocom's transport facilities in Illinois do not satisfy either of the two triggers established by the FCC in its TRO .

Q. DOES THAT COMPLETE YOUR REBUTTAL TESTIMONY?

A. Yes.